

REMARKS/ARGUMENTS

The non-final Office Action of July 27, 2005, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-14 remain pending. Applicants have not amended the claims and merely include a listing of the pending claims for the convenience of the Examiner.

Rejections under 35 U.S.C. § 112, first paragraph

Claims 9-10 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully traverse this rejection.

Applicants' claim 9 recites, "[t]he computer user interface of claim 1, wherein the at least one of the links linking to command code is based upon a heuristic." Applicants' claim 10 recites, "[t]he computer user interface of claim 9, wherein the heuristic are based upon analysis of current context of the at least one document page." Specifically, the Action states that [t]he claimed limitation [that] include[s] links are based upon heuristic is not taught by [the original] specification." (Action, page 2).

Applicants' written description includes support throughout for the terms and features in Applicants' claims 9 and 10. In particular, support for the term heuristics and its application to command code may be found, among other portions, on pages 14, 30, and 38 of Applicants' written description. For example, starting at line 15 on page 38, the written description reads,

Of course, other heuristics could also be used depending on the context. For example, when offering up a set of command choices to a user, the heuristics could be based on analysis of the user's current document context, recently used commands, and commands the user has used most frequently in this and similar contexts in the past. Such heuristics are described further, in the context of navigating to a particular portion of the Guide Book, in commonly assigned and currently pending U.S. Patent Application Serial No. 09/456,952, entitled Method and Apparatus for Providing Help and Settings Control to Users of an Electronic Book, filed contemporaneously herewith, which is incorporated herein by reference.

As noted in the above portion, U.S. Patent Application Serial No. 09/456,952, was properly incorporated by references and further support can be found in that application. As such,

Applicants' original written description and drawings provides ample support for the features of all claims in the present matter including the features recited in dependent claims 9 and 10. Applicants respectfully request withdrawal of the present matter. As no references have been applied against claims 9 and 10, Applicants request allowance of the claims.

Rejections under 35 U.S.C. § 103(a)

Claims 1-8 and 11-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over "Adobe Acrobat 3.0 Reader Online Guide," 9/1996, Adobe Systems, Inc., pages 1-110 (hereinafter referred to as *Adobe*) in view of "Joke eBook", 7/1998, PrimaSoft PC, Inc., Electronic Book Series version 1.0, pages 1-5 (hereinafter referred to as *Joke eBook*). Applicants respectfully traverse this rejection.

Applicants' independent claims 1 and 3 recite, among other features, "wherein at least one of the plurality of user interface document pages is configured to be manipulated." Any type of user interface element within *Adobe* or *Joke eBook* is not configured to be manipulated. Applicants submit that the combination of *Adobe* and *Joke eBook* fail to teach or suggest at least the feature of Applicants' claims 1 and 3.

In rejecting this feature of Applicants' claims 1 and 3, that Action relies on *Adobe* and states, "See Adobe pages 70-72, wherein Adobe teaches form filing that is equivalent to claimed manipulation since data is added to the document." (Action, page 3). However, the Action confuses a "user interface document page" with a "user content document page." Applicants' claims 1 and 3 specifically recite that at least one of the plurality of user interface document pages is configured to be manipulated. Pages 70-72 of *Adobe* describe copying and pasting content into a PDF document and/or a form; however, there is nothing in the cited portion or any other portion of *Adobe* that teaches or suggests that user interface documents are configured to be manipulated. Still further, Applicants disagree with the generalized statement that "form filing that is equivalent to claimed manipulation since data is added to the document." *Joke eBook* fails to cure at least this deficiency of *Adobe*.

Applicants' dependent claim 2, which depends from claim 1, is patentably distinct over the combination of *Adobe* and *Joke eBook* for at least the same reasons and further in view of the

novel features recited therein. As such, Applicants respectfully request reconsideration of the rejections of claims 1 and 3.

Applicants' independent claim 4 recites, among other features, "a selection model for allowing a user to select an object of a command after the user selects the command." The Action relies on highlighted text links or "Go to" commands to another page or topic. (Action, page 7). Upon selection of such a hyperlink by a user in the *Adobe* system, the user is jumped to another page or topic; however, the object of the command is never selected by the user. In such an example, only the command is selected. In the Action, page 102 of *Adobe* is relied upon for this feature of claim 4. Page 102 of *Adobe* shows a help page of the online guide and how when a user sees "text" that is highlighted in blue, selection of that text by a user will jump the user to another page regarding that topic. However, at best the user selects the command of jump, but not the object. To jump to a different page, or object, the user must choose a different "text" highlighted in blue. As such, contrary to the statement of the Action, *Adobe* fails to teach or suggest at least this feature of Applicants' independent claim 4.

Joke eBook fails to cure this deficiency of *Adobe*. As such, the combination of *Adobe* and *Joke eBook* fails to teach or suggest at least this feature of Applicants' claim 4. Reconsideration of the rejection is respectfully requested.

Further, Applicants' independent claim 5 recites, among other features, "executes a command by activating a link on a document page, and selects an object of the command in response to executing the command." For similar reasons are stated above with respect to claim 4, Applicants submit that the combination of *Adobe* and *Joke eBook* fails to teach or suggest at least this feature of Applicants' claim 5. Withdrawal of the rejection is respectfully requested.

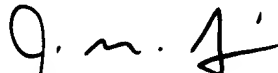
Applicants' claims 6-14, which ultimately depend from claims 1 and 4, are allowable over the art of record for at least the same reasons as their base claim and further in view of the novel features recited therein.

CONCLUSION

All rejections having been addressed, Applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same. Should the Examiner find that a telephonic or personal interview would expedite passage to issue of the present application, the Examiner is encouraged to contact the undersigned attorney at the telephone number indicated below. If any fees are required or if an overpayment has been made the Commissioner is authorized to charge or credit Deposit Account No. 19-0733.

Respectfully submitted,
BANNER & WITCOFF, LTD.

Date: October 26, 2005

By: 
John M. Fleming
Registration No. 56,536

1001 G Street, N.W.
Eleventh Floor
Washington, D.C. 20001-4597
(202) 824-3000